

MOTION FILED

DEC 9 1996

Nos. 95-1858
96-110 (64)

(63)

IN THE SUPREME COURT OF THE UNITED STATES
OCTOBER TERM, 1995

DENNIS VACCO, Attorney General
Petitioner

v

TIMOTHY QUILL, M.D. (and others)
Respondents

STATE OF WASHINGTON
Petitioner

v

HAROLD GLUCKSBERG
Respondent

ON CERTIORARI TO THE SECOND AND NINTH
CIRCUIT COURTS OF APPEAL

MOTION TO FILE BRIEF AS AMICUS CURIAE ON
BEHALF OF WAYNE COUNTY, MICHIGAN, IN SUPPORT
OF THE PETITIONERS, OUT OF TIME

JOHN D. O'HAIR
Prosecuting Attorney
County of Wayne

*TIMOTHY A. BAUGHMAN
Chief of Appeals
1441 St. Antoine
Detroit, MI 48226
313 224-5792

*counsel of record

4/28

MOTION TO FILE AS AMICUS CURIAE OUT OF TIME

NOW COMES Wayne County, Michigan, by John D. O'Hair, the Prosecuting Attorney of the County of Wayne, and Timothy A. Baughman, Chief of Research, Training and Appeals, and requests permission to file as amicus curiae in support of the petitioners out of time, as as reasons says as follows:

1. Amicus Wayne County has stated the reasons for filing as amicus in the brief itself.
2. The brief has itself been filed, and no delay will be occasioned in its consideration or review by the Court.
3. The brief was filed two days after the time for filing by the Petitioners, and an

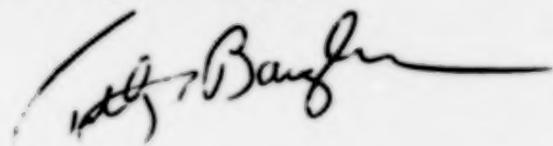
amicus must file within the time for filing of the party supported. Regrettably, counsel for amicus was unaware of the expedited schedule for filing set for the parties, and apologizes for the delay in filing.

RELIEF

Wherefore, amicus respectfully requests
that the motion to file as amicus out of
time be granted.

Respectfully submitted,

JOHN D. O'HAIR
Prosecuting Attorney
County of Wayne



TIMOTHY A. BAUGHMAN
Chief of Research,
Training and Appeals